

Brenda K. Baumgart, OSB No. 992160
bkbaumgart@stoel.com
John B. Dudrey, OSB No. 083085
jbdudrey@stoel.com
Karen L. O'Connor, OSB No. 953710
kloconnor@stoel.com
STOEL RIVES LLP
900 SW Fifth Avenue, Suite 2600
Portland, OR 97204
Telephone: (503) 224-3380
Facsimile: (503) 220-2480

Attorneys for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
EUGENE DIVISION

CAROL LYNN GILES, individually and on
behalf of all other persons similarly situated;
SHAWN H. DUNLAP, an individual;
CHERYL LEE FISHER, an individual;

Plaintiffs,

v.

ST. CHARLES HEALTH SYSTEM, INC.,
an Oregon corporation, doing business as
PIONEER MEMORIAL HOSPITAL; ST.
CHARLES MEDICAL CENTER – BEND;
ST. CHARLES MEDICAL CENTER –
REDMOND; and ST. CHARLES –
MADRAS,

Defendant.

Civil No. 2:13-cv-00019-AA

**DECLARATION OF REBECCA
MORGAN IN SUPPORT OF
DEFENDANT'S RESPONSE TO
PLAINTIFFS' MOTION FOR CLASS
CERTIFICATION**

I, Rebecca Morgan, declare as follow:

1. I am the Director of Human Resources for St. Charles Health System, Inc. (“St. Charles”). I have been employed with St. Charles in a human resources leadership capacity for more than five years, and have been employed in a human resources leadership capacity for approximately 15 years overall. I make this declaration based on my own personal knowledge.

2. In my previous declaration submitted in this case, I described a process by which St. Charles met with some of its caregivers to determine how much, if any, time they spent studying and testing for certain certifications that St. Charles requires them to complete. In all, St. Charles has met with approximately 500 caregivers, the majority of whom are registered nurses or respiratory therapists, regarding their study and test-taking time. Of those 500, approximately 450 reported unpaid study and test-taking time and either received wages for the time they reported or are in the process of receiving them.

3. St. Charles often uses the term “caregiver” to refer to its registered nurses. However, St. Charles also uses the term “caregiver” generically to refer to all of its employees, even employees like myself who do not provide medical care or who are not required to complete certifications as part of their position.

I declare under penalty of perjury that the foregoing is true and correct.

DATED: July 23, 2013.


Rebecca Morgan